GOVERNMENT OF THE VIRGIN ISLANDS
OF THE
UNITED STATES
—o—
Public Services Commission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington DC 20554

March 26, 2013

Re: Application of the Virgin Islands Public Services Commission for Reauthorization of the Virgin Islands Telecommunications Relay Service, CG Docket No. 03-123

Dear Ms. Dortch:

Enclosed, please find the application of the Virgin Islands Public Services Commission for the reauthorization of the Virgin Islands Telecommunications Relay Service. The TRS program had been previously authorized on July 16, 2008 in Application No. TRS-61-07.

Please let me know if you have any questions.

M. Thomas Jackson
Chairman

CC: Mr. Gregory Hlibok,
Chief, Disability Rights Division, FCC

P. O. Box 40, Charlotte Amalie, St. Thomas, Virgin Islands 00804-0040 — (340) 776-1291 — Fax: (340) 774-4971

Telecommunications Relay Service
Application for Renewal of Current Certification
Virgin Islands

Submitted to:
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington D.C. 20554

Submitted by:
Virgin Islands Public Services Commission
P.O. Box 40
Charlotte Amalie, USVI 00804

Introduction

This is an application submitted by the Virgin Islands Public Services Commission ("VIPSC") for renewal of the certification of Telecommunications Relay Service in the Territory of the Virgin Islands pursuant to the rules and procedures set forth by the Federal Communications Commission. The Virgin Islands have been certified for the certification period beginning July 26, 2008 and ending July 25, 2013 and seeks renewal for an additional-five year period beginning July 26, 2013. The VIPSC prepared this TRS certification renewal application with the assistance of the Virgin Islands Telephone Corp. d/b/a Innovative Telephone, Sprint Communications Company L.P. d/b/a Sprint, and Hamilton Telephone Company d/b/a Hamilton Telecommunications.

Innovative Telephone has contracted with Sprint to provide Telecommunications Relay Service in the Virgin Islands effective May 1, 2013 consistent with the operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Sprint will replace Hamilton Relay, which is currently operating the Virgin Islands Telecommunications Relay Service under contract with Innovative Telephone that covers the period of August 25, 2005 to April 30, 2013. The service is currently provided for the Virgin Islands from Hamilton Relay's Louisiana Center located at 9107 Bluebonnet Centre Blvd., Baton Rouge, LA 70809

Please note that although Sprint provides Internet Protocol (IP) and Captioned telephone web-based services, Virgin Islands Telecommunications Relay Service does not contract to provide these services in the Virgin Islands, nor is Innovative Telephone responsible for oversight of IP and VRS or other Internet or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

Official notices, documentation and correspondence related to this application should be directed to:

Mickey Breton
VP and General Manager
Innovative Telephone
4611 Tutu Park Suite #200
St. Thomas, VI 00802
Phone: (340) 715-8341
Fax: 340-775-8567
Email: mickey.breton@innovativevi.net

Operational questions about the existing service may also be directed to the following:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1001 12th Street
Aurora, NE 68818
Voice/TTY: 402-694-3656
Toll Free: 800-618-4781
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

Operational questions about upcoming services (beginning May 1, 2013) may also be directed to the following:

John Moore
Branch Manager of Relay Program Management
Sprint Relay
333 Inverness Drive, South
Englewood, CO 80112
303 721 4090 (Voice)
Email: John.e.moore@sprint.com
Website: www.sprintrelay.com

Request for Renewal of Current State Certification

The Virgin Islands Public Services Commission requests the Federal Communications Commission to renew the authorization of the Virgin Islands Telecommunications Relay Service. The Virgin Islands Telecommunications Service is currently provided through Hamilton Telephone Company d/b/a Hamilton Telecommunications. Effective May 1, 2013, the service will be provided by Sprint Communications Company L.P. d/b/a Sprint Relay.

Virgin Islands Public Services Commission

By: _____

M. Thomas Jackson
Chairman

VIRGIN ISLANDS TELECOMMUNICATIONS RELAY SERVICE
APPLICATION FOR RENEWAL OF CURRENT STATE CERTIFICATION

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Operational Standards

A.1 Communication Assistants (CAs)

§64.604(a)(1)(i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities.

SEE APPENDIX A for a complete listing of Virgin Islands Telecommunications Relay standards and features.

Recognizing that high quality Relay Communications Assistants ("CAs") are critical to providing consumer satisfaction, the Virgin Islands Telecommunications Relay Service thoroughly trains its Relay CAs to meet the specialized communications needs of individuals who are deaf, hard of hearing or have difficulty speaking. All Virgin Islands Telecommunications Relay Service CAs possess clear and articulate voice communications. They have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with the various cultures of relay users, languages and etiquette. All Virgin Islands Telecommunications Relay Service CAs provide a typing speed of a minimum of 60 words per minute demonstrated through oral-to-type tests of CA speed.

Past Compliance

Hamilton CAs were trained to relay calls in a manner that meets and often exceeds FCC standards. The following describes how the Virgin Islands Telecommunications Relay Service's service provider trained its CAs to meet operational proficiency standards stated above. Before hiring, exams were given to each applicant in the following areas to ensure that the candidate had the needed skills to become a fully trained Relay CA:

(1) Spelling skills (must achieve at least 90% correct)
(2) Reading skills (must be able to read clearly and distinctly)
(3) Typing proficiency

Additional details about these requirements are explained further in the following sections.

Training

As a part of the initial three-week training period provided by Hamilton, all Virgin Islands Telecommunications Relay Service staff, including management, received 20 hours of initial training devoted solely to disability issues including ASL "gloss", ASL style and grammar, tone of voice, deaf, hard of hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This training was done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs were well trained to effectively meet the specialized needs of relay users.

Spanish language relay CAs completed the same training as all traditional Relay CAs and passed tests confirming proficiency in the Spanish language.

Proficiency Examinations

The Virgin Islands Telecommunications Relay Service CAs began relaying calls at the end of the three-week training period, after all examinations had been passed and proficiency skills had been shown. In addition to these exams and skill tests, CAs successfully completed several relay call scenarios to demonstrate proficiency in simulated scenarios. Tests were kept confidential and portions of the tests were changed routinely. CAs were tested on a variety of topics monthly to ensure that they continued to meet all requirements.

Future Compliance

Beginning on May 1, 2013, Sprint will provide the hiring, training and oversight of Communication Assistants for Virgin Islands TRS. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of Relay and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a twelfth-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

- Preference is given to CA applicants with TRS experience, knowledge of American Sign Language, or experience working with individuals who are deaf, hard of hearing or have a speech disability.
- All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history.
- After an applicant's educational history, employment history and typing test results are reviewed; a determination is made as to whether the applicant meets the minimum CA requirements.
- A human resources representative will then screen potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment.
- Sprint TRS CA applicants are required to pass a valid and unbiased 12th grade level spelling test to be considered for employment.
- Sprint TRS CA applicants must pass a valid unbiased 12th grade level grammar test to be considered for employment.
- Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality.

- If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

This process ensures that only qualified applicants are hired to work at Sprint Relay centers as a CA. Each CA receives eighty hours of initial training of which 20 hours are dedicated to Diversified Culture. Once a CA applicant graduates the initial training period, Sprint monitors CA skills through internal and external Quality Assurance testing including two remote call surveys per month.

§64.604(a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

Virgin Islands Telecommunications Relay Service CAs demonstrate competent skills in typing, grammar, spelling, interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages and etiquette. In addition, Virgin Islands Telecommunication Relay Service CAs possess clear and articulate voice communications.

Past Compliance

Typing Proficiency

Hamilton Communication Assistants were required to type 60 words per minute (wpm) for five minutes. The Virgin Islands Telecommunications Relay Service exceeded the standard by requiring CAs to maintain a 95% accuracy level while typing 60 wpm. The Virgin Islands Telecommunications Relay Service's provider (Hamilton) has an average typing speed of 68.9 wpm with 98% accuracy.

Newly hired CA were required to meet the Virgin Islands Telecommunications Relay Service minimum typing proficiency standard on an oral-to-text exam within a three week period before they took calls. The Virgin Islands Telecommunications Relay Service also tested its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If a CA was unable to meet the 60 wpm requirement, the CA was removed from live relay calls until further training and compliance can be accomplished.

The Virgin Islands Telecommunications Relay Service used a computer based typing program for continuing enhancement of keyboarding, spelling and grammar skills. This program was available to all CAs.

The Virgin Islands Telecommunications Relay Service performed test calls to document current proficiency levels of the CAs and to make sure each was making progress over the term of their employment. Conducting typing tests during live relay calls also ensured that Relay CAs were meeting all typing requirements during actual calls.

English Reading, Speaking, and Writing Skills

Communication Assistants met all grammar proficiency requirements including reading, speaking, and writing English Communication at a minimum of a 12th grade level prior to employment. The Virgin Islands Telecommunications Relay Service also tested for diction, clear and articulate voice

communications and a neutral accent by requiring each prospective CA to complete a reading exam.

Spelling Skills
The minimum spelling skill required of the Communication Assistants was the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. CAs were required to pass a spelling exam to be eligible to work as a Virgin Islands Telecommunications Relay Service CA and to score in at least the 90th percentile. The spelling skills exam was based on a 12th grade spelling level. The Virgin Islands Telecommunications Relay Service performed similar testing for Spanish CAs.

Interpretation of Typewritten ASL and Familiarity of Culture
All Virgin Islands Telecommunications Relay Service staff, including management, received 20 hours of initial training devoted solely to disability issues including ASL "gloss", ASL style and grammar, tone of voice, deaf, hard of hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This training was done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs were well trained to effectively meet the specialized needs of relay users.

In addition to basic training during new hire training, the Virgin Islands Telecommunications Relay Service provided an additional 12 hours of specialized/cultural training annually.

Spanish language relay CAs completed the same training as all traditional Relay CAs and were required to pass additional tests confirming proficiency in the Spanish language.

Future Compliance
Sprint has a well-documented history of providing CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint requires all CAs to possess clear and articulate voice communications. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. Sprint CAs must demonstrate Relay skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Sprint CAs must type 60 WPM prior to taking live calls and post training must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Sprint's diversified culture training program provides the CA with information about understanding TRS users including deaf users and their culture, history and communication needs. Sprint's diversified culture program incorporates training includes the characteristics and of hard-of-hearing and late deafened users, deaf/blind and speech disabled users.
- Demonstrate a professional and courteous phone image
- Process calls using live training terminals in an efficient and knowledgeable manner

- Role-play scenarios written in varying levels of ASL

Sprint provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA
- Recommendation and/or approval from supervisor or manager
- Attend and complete speech to speech specialized Speech to Speech training program including a written evaluation.
- Proficiency in all areas of Relay call processing including grammar, enunciation and vocabulary
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint's STS training is delivered by individuals with professional experience related to Speech Disabilities and/or consumer experts and is based on adult learning theories.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on Speech-to-Speech Services. Sprint's STS training program has been developed based on direct experience and consultation with individuals with a speech disability.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy.

The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE	
Sprint Values and Goals	
Training Agenda	
▪ Objectives / Training Outline ▪ Introduction and History ▪ Video ▪ Service Description ▪ Characteristics of Customers ▪ Stereotypes	▪ Speech-Disabilities ▪ Attributes of Speech-to-Speech Relay CAs ▪ Speech-to-Speech verses Traditional Relay ▪ FCC Requirements ▪ Speech-to-Speech Variations ▪ Assessment
Work Performance Components	
▪ Basic Call Processing ▪ Call set up ▪ Customer Database ▪ Frequently Dialed Numbers ▪ Customer Requests	▪ Confidentiality ▪ Transparency ▪ Personal Conversations ▪ Developmental Skill Practice ▪ Audio

STS TRAINING OUTLINE	
Sprint Values and Goals	
▪ Emergency Call Processing	▪ Observation
Participation	
▪ CA training ▪ Taking over calls – 15 minute ▪ CA work performance	▪ Call Focus ▪ Teamwork – support peer
Confidentiality and Transparency	
▪ Discuss call speech patterns ▪ Discuss techniques customer uses ▪ Have two CAs on one call, if necessary or customer requests.	▪ Unacceptable to: ▪ Have conversation regarding information discussed on calls ▪ Discuss customers in general

CA Quality Assurance Programs

Sprint Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is maintained throughout the TRS network of Relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and discuss concerns and how to address them. The training team is located in seven (7) Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customer's feedback and takes proactive steps to implement suggestions and feedback. Sprint Relay does not develop training and consumer education programs for the telecommunications Relay service alone. Sprint Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training all TRS programs.

§64.604(a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

The Virgin Islands Telecommunications Relay Service requires that all Communication Assistants type 60 words per minute (wpm) for five minutes using oral-to-type tests of CA speed. In addition, the Virgin Islands Telecommunication Relay Service exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm.

Past Compliance

The Virgin Islands Telecommunications Relay Service's provider had an average typing speed of 68.9 wpm with 98% accuracy. Newly hired CA were required to meet the Virgin Islands Telecommunications Relay Service minimum typing proficiency standard on an oral-to-text exam within a three week period before they took calls. The Virgin Islands Telecommunications Relay Service also tested its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If a CA was unable to meet the 60 wpm requirement, the CA was removed from live relay calls until further training and compliance can be accomplished.

Future Compliance
Beginning on May 1, 2013, Sprint will provide CAs who type at least 60 words per minute on oral-to-type tests. Sprint conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the Relay environment. Internal testing on typing speeds demonstrated that Sprint's CAs typed an average of 83.9 words per minute (wpm), with at least 95% accuracy. In fact almost a third of Sprint's CAs type over 90 wpm! While technological aids are not used in quarterly internal testing, tools are included in Sprint's TRS software to aid Sprint CAs to process calls more efficiently.

§64.604(a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Innovative Telephone does not contract to provide VRS services for the Virgin Islands Telecommunications Relay program, nor is the state responsible for the oversight of VRS.

§64.604(a)(1)(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

Innovative Telephone's contract with the Virgin Island Telecommunications Relay provider includes provisions with stipulate that CAs answering and placing TRS calls must stay with the call for a minimum of ten minutes and STS calls for fifteen minutes.

Past Compliance
The Virgin Islands Telecommunications Relay Service provider, Hamilton, substituted a CA only if the following occured:

- **A caller requested a change in gender of the CA**
  The Virgin Islands Telecommunications Relay Service CAs, when requested, switched a call to another CA who is of the same gender as the caller and retained that CA for the user throughout the relay call.
- **Verbal abuse or obscenity was directed to the CA**
  If a relay user became abusive towards a CA (calling names, etc.) or did not give a number to dial, the Virgin Islands Telecommunications Relay Service's procedure was to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key was sent. If the CA was still being harassed or was not given a number to dial, a supervisor was called. The supervisor tried to process the call. If abuse continued or there was no response, a disconnect slip was completed.
- **The call required a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest existed or,**
- **A major emergency existed**

A change never took place until either the calling or called party has completed their part of the conversation.

Future Compliance

Beginning May 1, 2013, Sprint will meet or exceed all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken-over unless it is absolutely necessary to do so. Sprint CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of ten minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA
- Call requires a specialist (STS, Spanish, etc)
- CA Illness
- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of ten or fifteen minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either Relay participant including the following:
    - Sprint attempts to honor any requests for a specific gender during call transitions.
    - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604(a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

The Virgin Islands Telecommunication Relay Service makes best efforts to accommodate a CA gender request at the time a call is initiated and any time the call is transferred to another CA.

Past Compliance

Hamilton Communication Assistants, when requested, switched a call to another Communication Assistant who was of the gender requested by the caller and retained that gender for the user throughout the relay call.

Future Compliance
Sprint Communication Assistants support CA gender requests. Virgin Islands Telecommunication Relay Service users can select their preferred gender on a per-call or per-line basis through the Customer Profile. When a preference is identified, Sprint makes a best effort to accommodate the TRS user's preference throughout the call.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

The Virgin Islands Telecommunications Relay Service does and will continue to transmit conversations between Relay and voice callers in real time.

A.2 Confidentiality and Conversation Context

§64.604(a)(2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

The Virgin Islands Telecommunications Relay Service has methods and processes in place to ensure that the confidentiality of TRS users is maintained in line with FCC requirements.

Past Compliance
The Virgin Islands Telecommunications Relay Service CAs were instructed not to disclose the content of any relayed conversation regardless of content, and to refrain from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. CAs were instructed not to intentionally alter a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs were instructed to relay all conversation verbatim unless the relay user specifically requested summarization or if the user requested interpretation of a call. The Virgin Islands Telecommunications Relay Service employed various methods to ensure that all relay users' confidentiality was maintained, including the restriction of access to its call centers and the partitioning of CAs into individual cubicles to ensure relay call privacy. All Virgin Islands Telecommunications Relay Service employees signed a confidentiality agreement committing to keep all information confidential.

All information about users was treated confidentially and was not be sold, distributed, shared, or divulged by Hamilton or any of its employees, unless divulging such information was compelled by lawful order.

Future Compliance

Sprint will treat all TRS customer information (including call set-up instructions, customer profile information, etc...) in accordance with the FCC regulations. This information is treated as confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the Relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

Sprint's confidentiality expectations are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the Center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in Relay work areas.
- Supervisors are present in the work area to observe behavior.
- All Relay Center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

§64.604(a)(2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech

disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Virgin Islands Telecommunications Relay Service CAs are instructed not to disclose the content of any relayed conversation regardless of content, and to refrain from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. CAs are instructed not to intentionally alter a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs are instructed to relay all conversation verbatim unless the relay user specifically requests summarization or if the user requests interpretation of a call.

Past Compliance
The Virgin Islands Telecommunications Relay Service employed various methods to ensure that all relay users' confidentiality is maintained, including the restriction of access to its call centers and the partitioning of CAs into individual cubicles to ensure relay call privacy. All Virgin Islands Telecommunications Relay Service employees signed a confidentiality agreement committing to keep all information confidential.

Future Compliance
As described above, Sprint also enlists processes and procedures to protect Virgin Islands Telecommunication Relay Service users' information. All information about users is treated confidentially and will not be sold, distributed, shared, or divulged by the TRS provider or any of its respective employees, unless divulging such information is compelled by lawful order. CAs must annually sign a confidentiality agreement committing to keeping all information confidential.

STS Limited Exception of Retention of Information
Beginning on May 1, 2013, at the request of a caller, Sprint Speech-to-Speech (STS) CAs will retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing to a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Sprint puts control of the call with the STS user.

- CAs accept their being involved only to the point of facilitating communication as a "human telephone wire."
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

A.3 Types of Calls

§64.604(a)(3)(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

The Virgin Islands Telecommunications Relay Service does not and will not in the future place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. In the future, Sprint, the Virgin Islands Telecommunications Relay Service provider, will manage its traffic loads in a manner that will not require that customers be asked to call back later.

§64.604(a)(3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

The Virgin Islands Telecommunications Relay Service is capable of processing calls normally provided by telecommunication carriers unless the Commission determines that a type of call is not feasible. For example, the FCC has ruled that coin sent paid calls is not feasible through Relay as the technology and networks between the common carrier network, payphones and relay do not allow for signaling to be passed so that a Communication Assistant can determine when coins have been dropped into the payphone. The Virgin Islands Telecommunications Relay Service does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Past Performance
The Virgin Islands Telecommunications Relay Service's system provided for and served all of the following types of calls.

(1) Local calls originating and terminating within the Virgin Islands, including extended area service and optional calling plan calls

(2) Interstate calls that originate or terminate within the Virgin Islands - Billed to the TRS Interstate Fund

(3) International calls that originate or terminate within the Virgin Islands - Billed to the TRS Interstate Fund

The Virgin Islands Telecommunications Relay Service's service was designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention.

Hamilton allowed customers to select their preferred carrier and to select billing such as non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, hotel calls, calls charged to a third party, credit cards, and any Virgin Islands local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes

all major interexchange company calling cards. Hamilton, the Virgin Islands Telecommunications Relay Service previous provider, billed no calls and received no revenue.

Future Compliance
Beginning in May of 2013, Virgin Islands Telecommunication Relay Service, through Sprint, will processes local (intrastate), interstate, international, toll-free, wireless and pay-per-calls. Virgin Island Telecommunication Relay Service users will also have unlimited access to directory assistance and operator assistance.

Virgin Island Telecommunication Relay Service users are able to select any billing option supported by their preferred carrier of choice including collect, person-to-person, third-party, prepaid calling cards, credit cards and non-proprietary calling cards offered by the local or any other interexchange carrier. Virgin Islands TRS will also process calls to or from restricted lines e.g. hotel rooms and pay telephones. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

§64.604(a)(3)(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

If a long distance provider declines to complete a call because credit authorization is denied, the Virgin Islands Telecommunication Relay Service provider does and will continue to relay the message verbatim to the relay user and follow the user's instructions.

§64.604(a)(3)(iv) Relay services shall be capable of handling pay-per-call calls.

Virgin Islands Telecommunications Relay is capable of handling pay-per-call services.

Past Compliance
Virgin Islands Telecommunications Relay allowed relay users to access pay-per-call services in which the company providing the service bills the end-user directly. Customers who did not want pay-per-calls made from their telephone line through the Virgin Islands Telecommunications Relay service had the ability to complete a Customer Profile form which contains an option that will block these calls from that particular telephone line. If a caller attempted to place a pay-per-call from a blocked line, the CA received notification at the workstation that this call was blocked and was unable to place the call.

Future Compliance
As of May 1, 2013, Sprint will provide 900 calling services through a dedicated toll-free 900 access number. Sprint was the first provider to process pay-per-calls, beginning in 1996. Callers to Virgin Island TRS access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone.

§64.604(a)(3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

Virgin Islands Telecommunications Relay provides all of the mandatory call types including text-to-voice, voice-to-text, voice carry over (VCO), two-line VCO, VCO-to-TTY, VCO-to-VCO, hearing carry over (HCO), two-line HCO, HCO-to-TTY, and HCO-to-HCO. Each of these types of calls is described below.

TTY/ASCII to Voice
The Virgin Islands Telecommunications Relay Service is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Call Processing
The Virgin Islands Telecommunications Relay Service is able to accept a call from a hearing and voice capable caller, place a call to a text based caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Carryover (VCO)
The Virgin Islands Telecommunications Relay Service allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Virgin Islands Telecommunications Relay Service.

Two-Line VCO
Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Reverse Two-Line VCO
Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

VCO-TTY and TTY-VCO
The Virgin Islands Telecommunications Relay Service provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

VCO-VCO

The Virgin Islands Telecommunications Relay Service provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

Hearing Carryover (HCO)
The Virgin Islands Telecommunications Relay Service allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through the Virgin Islands Telecommunications Relay Service.

Two-Line HCO
To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

HCO-TTY and TTY-HCO
The Virgin Islands Telecommunications Relay Service provides his feature allowing HCO users to contact TTY users (or vice versa) via the relay.

HCO-HCO
This service allows two HCO users to contact each other through the relay. The Virgin Islands Telecommunications Relay Service provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

Future Compliance
Virgin Islands TRS, offered through Sprint on May 1, 2013, will provide access to all available relay call types that meet and in some cases exceed the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO.

In addition to the types of calls, Sprint will provide the following enhancements to Virgin Island Telecommunication Relay Service users:

- Privacy Options that allow the carry over user to keep private the portions of conversation which the Communication Assistant does not need to hear

- Temporary and permanent branding options which allow VCO or HCO callers to receive custom greetings and speed up call set-up

- Standardized and personalized carry over call announcements and explanations to allow Virgin Island Relay Service users to customize their call

- Voice Call Progression which allows callers who can hear to listen to the call set-up as it occurs.

§64.604(a)(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Virgin Islands Telecommunications Relay is capable of providing call release functionality which allows TTY users to place calls which need the Communication Assistant to assist the caller before connecting to another TTY (e.g., a voice switchboard which transfers to an extension answered by a TTY user). Once the CA reaches a compatible TTY user when placing a relay call, the Virgin Islands Telecommunications Relay Service gives the calling party the option to communicate independent of the relay function.

Virgin Islands Telecommunications Relay also allows users to register a list of frequently dialed numbers with names, known as speed dialing functionality. To place calls, the Virgin Island Telecommunication Relay user simply asks the Communication Assistant to dial the name of the speed dial entry (e.g., "Call mom").

The Virgin Islands Telecommunications Relay Service provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

Past Performance
Hamilton provided TTY to TTY call release functionality, speed dialing for up to 50 numbers and three way calling (as described above). In addition, the Virgin Islands Telecommunications Relay Service provided a voice to voice call release function, which removed the workstation from the call. If the call is a long distance call, the call was billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call was released from the workstation, the call ceased to be a TRS call.

Future Compliance
Beginning on May 1, 2013, Sprint will provide TTY to TTY call release, speed dialing functionality for up to 30 numbers, and three-way calling (as described above). Through Sprint, Virgin Islands Telecommunication Relay Service users are able to access speed dial services from any location by providing a user name and password. Sprint does not support voice to voice call release as these calls do not require the assistance of a Communication Assistant.

§64.604(a)(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

The Virgin Islands Telecommunications Relay Service provides its users with access to voice mail and interactive menus. When a recorded message or interactive menu is encountered, the CA presses a hot key to inform the user. Messages are electronically captured and retained for the

length of the call. The Virgin Islands Telecommunication Relay Service does not impose additional charges if additional calls are needed to complete calls involving recorded or interactive messages.

Past Compliance

The Virgin Islands Telecommunications Relay Service's recording function through Hamilton allowed the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informed the relay user through the use of a hot key on the CA's terminal that a recording was reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requested a department or live person, the CA typed, "HLDING FOR DEPT/PERSON" and pressed the appropriate option when the recording prompts.

If a caller requested listening to the complete message, the CA sent a hot key that stated, "COLLECTING INFO PLS HLD" and the CA continued to collect the recording.

The message was retained only for the length of the call. This prevented the caller from having to call back several times to get the entire message. Once the originator of the call disconnected, the recording was automatically deleted from the system.

When the Virgin Islands Telecommunications Relay Service had to redial to an answering machine, voice mail, interactive voice messaging unit or any other type of recording system, for whatever reason, the Virgin Islands Telecommunications Relay Service did so without billing the customer for any subsequent long distance relay calls.

Future Compliance

Virgin Island TRS, through Sprint, will provide an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint's hot key sends text to the user which says "(RECORDING)." Sprint's hot keys are available in all supported languages, including English and Spanish.

Virgin Island TRS will have the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

Virgin Island TRS will not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call without charge so the end user is not imposed charges for additional calls.

§64.604(a)(3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

The Virgin Islands Telecommunications Relay Service does and will continue to provide access for its users to retrieve messages from answering machines and voice mail. This includes messages which can be retrieved through interactive phone systems as well as answering machines located at the customer's location.

Past Compliance
Communication Assistants were trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants used the following procedures to obtain messages for relay users:

1. The user was informed that the Communication Assistant reached a voice processing system.

2. If the user requested message retrieval, the Virgin Islands Telecommunications Relay Service obtained the appropriate access codes from the user. The Virgin Islands Telecommunications Relay Service did not retain access codes or any other information needed to access a voice mail system subsequent to the call. This information was considered "call" information and just like any other call information, was kept confidential.

3. After the voice processing system was accessed, the Virgin Islands Telecommunications Relay Service Communication Assistants began to relay any messages that were recorded or left a message, as requested. Virgin Islands Telecommunications Relay Service made use of its advanced recording function to capture this information as discussed previously.

4. If the Communication Assistants had to call again to finish relaying any messages, the Virgin Islands Telecommunications Relay Service Communication Assistants did so without billing the end user for subsequent calls.

The Virgin Islands Telecommunications Relay Service alerted relay users to the presence of a recorded message and/or interactive menu. The Virgin Islands Telecommunications Relay Service used hot keys (automatic macros) to announce recordings or interactive messages. The Virgin Islands Telecommunications Relay Service did not charge a relay user for subsequent calls to a recording or to interactive message.

The Virgin Islands Telecommunications Relay Service provided this service in which messages from a voice or TTY answering machine or a single line telephone were retrieved by the CA. The caller requested Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and played the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. The Virgin Islands Telecommunications Relay Service recorded any messages, enabling the Communication Assistant to capture the information and to type or voice it back to the relay customer. Once the information was relayed to the caller and the call was completed, the recording was automatically erased when the caller disconnected.

Future Compliance

Virgin Island TRS has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA will follow the following process:

- The CA will inform the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes will follow the user's instructions. Sprint will use the touch-tone capability embedded in Sprint's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, Virgin Island TRS CAs uses advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call so the end user is not imposed charges for additional calls. If the CA needs to redial local calls are free, if the call is long distance the customer is only charged long distance calls for the first call.
- Sprint's platform will provide the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

The Virgin Islands Telecommunications Relay Service as provided by Sprint also processes answering machine retrieval from the customer's location. The Communication Assistant instructs users to place the handset near the speaker of the answering machine. The Virgin Islands Telecommunications Relay Service records any messages and then the Communication Assistant types it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

A.4 Handling of Emergency Calls

§64.604(a)(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

The Virgin Islands Telecommunications Relay Service provides emergency call handling that meets all FCC minimum requirements including automatic identification and immediate transfer of emergency calls to an appropriate PSAP that is capable of dispatching emergency calls in an expeditious manner.

Past Compliance
The Virgin Islands Telecommunications Relay Service's provider used a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

The Virgin Islands Telecommunications Relay Service followed the procedures below:

- If the caller had the local emergency number which needs to be accessed, the call was promptly placed and handled in the same manner as any other relay call.

- In the event that a caller did not have the access number to 911 and the emergency appeared to be of a nature that time will not permit the caller to hang up and call directly to 911, the CA contacted the Emergency Call Relay Center (ECRXC) which was accomplished through one stroke on the keyboard.

- Simultaneously, the CA obtained the address from which the person was calling from and selected the "emergency call" box option on the software at the workstation. (A Supervisor assisted every 911 call.) When a Communication Assistant made this selection, a Supervisor was notified immediately as a flag indicator on the Supervisor Console was activated.)

- Once connected to the ECRC, the CA identified it as a TTY relay call and relayed the location of the caller. (If the CA did not obtain location information, the CA gave the ECRC the ANI of the caller.)

- The ECRC immediately transferred the call to the appropriate PSAP center. The ECRC dropped off the call once confirming that both parties were on the line and the correct PSAP was reached. The CA processed the call as normal.

- The Virgin Islands Telecommunications Relay Service passed the caller's telephone number to the PSAP when a caller disconnected before being connected to emergency services.

Back-up Emergency Procedures
As a back-up to Intrado in the event that Intrado was unable to match the caller with the appropriate PSAP, the Virgin Islands Telecommunications Relay Service's provider had procedures in place to access its own emergency database:

- The software used by the Virgin Islands Telecommunications Relay Service took the NPA/NXX information from the ANI of an incoming call and matched it to information in its database. The ANI indicated what city or location a call is coming from. This NPA/NXX information was then cross-referenced to a list of locations in the Virgin Islands stored in

the database. The Virgin Islands Telecommunications Relay Service mapped each NPA/NXX in the Virgin Islands to the appropriate PSAP. Once this search was complete (it only took a second) the correct emergency telephone number was loaded automatically into the "outdial" box and the Communication Assistant immediately dialed the appropriate emergency personnel. This process ensured that the Virgin Islands Telecommunications Relay Service users had access to the correct and appropriate PSAP.

- The Virgin Islands Telecommunications Relay Service passed the caller's telephone number to the PSAP when a caller disconnected before being connected to emergency services.

- If the caller used a cellular or wireless phone, the ANI was not a good indication of where the caller was actually positioned. In this case, the CA asked for the nearest city name and initiated an automated search for the appropriate PSAP. If several PSAPs were listed for the same city, the CA tried to identify the correct one with a quick question to the caller.

- The Virgin Islands Telecommunications Relay Service's emergency database application described above meets the current requirements established by the FCC.

FCC Rules for Emergency Calls

In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." The Virgin Islands Telecommunications Relay Service's database automatically and immediately transferred the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). The Virgin Islands Telecommunications Relay Service accomplished this through two mechanisms to ensure that relay users are connected to the appropriate PSAP:

1) through the use of Intrado's 9-1-1 infrastructure and

2) through the PSAP database maintained by the Virgin Islands 's provider.

TTY to TTY Communications Between PSAP and Caller

The Virgin Islands Telecommunications Relay Service processed direct TTY to TTY communications between the PSAP and the TTY caller.

If a Caller Disconnects Before Being Connected to the PSAP

In the event that a caller disconnected before being connected to the PSAP even if the CA was unable to get the number of the caller before the call was disconnected, the workstation contained a notification feature that initiated a command to write a record of the ANI calling for emergency assistance. The Supervisor was able then access this information if needed, so no matter when the caller hunp up, the Virgin Islands Telecommunications Relay Service could send the correct ANI information to the 911 center.

The Supervisor contacted the appropriate 911 center and gave the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center had "Enhanced 911 Services", emergency personnel would be able to locate where the person in need was calling from.

During the course of emergency 911 calls, the CA continually solicited as much information as possible about the nature of the emergency so that in the event that the caller could not complete the call for any reason, the CA could have an opportunity to seek out the appropriate emergency assistance. The CA then gave the dispatcher any pertinent information collected on the call even if the originator of the call had disconnected. This included ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel would be able to locate where the person in need is calling from. This met the FCC's current requirement where a CA must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

The emergency call plan used by the Virgin Islands Telecommunications Relay Service follows this section. This covers the scenario of a relay user disconnecting before the call was completed. If the 911 call was completed, the CA followed normal relay procedures with the assistance of a supervisor and the caller's ANI was transferred to the appropriate PSAP as described above.

Through its outreach programs and outreach materials, the Virgin Islands Telecommunications Relay Service educated relay users about how to use 911 services. As a part of this information, the Virgin Islands Telecommunications Relay Service encouraged relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center would be able to process a TTY call correctly in the event of an emergency.

In addition, the Virgin Islands Telecommunications Relay Service gave presentations to 911 centers routinely as part of its outreach program. The Virgin Islands Telecommunications Relay Service provided training and other assistance to emergency dispatchers to ensure TTY calls or relay calls were handled correctly.

Future Compliance

Sprint will accept incoming emergency calls, and will automatically and immediately transfer a call to an appropriate Public Safety Answering Point (PSAP). Through its contract with Sprint, Virgin Island TRS will have access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

Virgin Island TRS uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call.

1.	Virgin Island TRS CAs act upon the word "emergency". Calls placed to fire, police,

	ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function key (i.e., "hot key") which designates the call as an Emergency. This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 Center.
3.	Simultaneously, the CA presses a key to notify the Supervisor. The Supervisor will assist the CA in processing the call, if needed. The Supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (i.e., telephone number) is passed to the E-911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Florida Relay Service. They are calling from (caller's telephone number). This is CA # 1234, one moment please."
6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON LINE NOW)" and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other Relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to the PSAP (TTY).
9.	The CA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.

Back up Procedures

Through their contract with Sprint, Virgin Island TRS will have access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

Training and Support Materials

Virgin Island TRS CAs and Supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of Emergency processes and procedures.

Supervisors or Operations Administrators are available 24/7/365 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center
If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or Supervisor will notify the PSAP Call Center of the premature disconnect and will provide any customer information that may assist the PSAP center in resolving the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, Sprint ALWAYS connects the caller to the POLICE. The CA will notify the Supervisor who, in turn, calls the police and passes on all known information about the call. The CA will also fill out an Emergency Incident Form as a record. The police will make the determination as to what kind of emergency it is and will dispatch the required emergency service.

Voice Emergency Calls
If a voice customer misdials 711 when actually they require assistance through 911, the CA will say to the inbound voice: "***You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance."***

When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

§64.604(a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Virgin Island TRS does and will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Virgin Island TRS's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," the STS CA will repeat the name and state the telephone number and then dial the associated ten-digit telephone number without delay.

Past Compliance

Hamilton provided STS users with the ability to retain STS called numbers as a part of the Customer Profile and complied with the process described above. At the end of the contract, Hamilton transferred Customer Profile information to the new Virgin Islands Telecommunications Relay Service provider.

Future Compliance
Sprint provides STS users with the ability to retain STS called numbers as a part of the Customer Profile and complied with the process described above. At the end of the current contract term, Sprint will transfer Customer Profile information, including STS Called Numbers, to the incoming Virgin Islands Telecommunications Relay Service provider, if applicable.

§64.604(a)(6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

Virgin Islands Telecommunications Relay does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604(a)(7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

Virgin Islands Telecommunications Relay does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards

B.1 ASCII and Baudot

§64.604(b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Virgin Islands Telecommunications Relay is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by Virgin Islands Telecommunications Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly.

B.2 Speed of Answer

§64.604(b)(2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

§64.604(b)(2)(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

§64.604(b)(2)(ii)(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

§64.604(b)(2)(ii)(B) Abandoned calls shall be included in the speed-of-answer calculation.

§64.604(b)(ii)(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

The Virgin Islands Telecommunications Relay Service complies with all speed of answer requirements to ensure that its users experience the same level of service provided to users through the voice telephone network.

Past Compliance

Virgin Islands Telecommunications Relay has been committed to complying with the speed of answer requirements applicable to relay. Virgin Islands Relay answered eighty-five percent (85%) of calls within ten (10) seconds from the time the call enters the TRS system during all times of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold. Virgin Islands Telecommunications Relay has outstanding answer performance. Average answer seconds for the past year were 0.3 with 98% of calls answered in ten seconds or less.

Future Compliance

Sprint will ensure that at least 85% of all Virgin Islands Telecommunication Service calls are answered within ten seconds in compliance with all FCC regulations for speed of answer. Sprint currently has a large number of TRS Centers across the U.S. ensuring a robust workforce. Having access to geographically-disbursed centers ensures adequate staffing for TRS calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each-15 minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations.

Sprint will also review each center's results for the previous six weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint will ensure that total network traffic is accounted for by each of the centers. By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604(b)(ii)(D) The system shall be designed to a P.01 standard.

Virgin Islands Telecommunications Relay also meets all FCC call blockage standards. Virgin Islands Telecommunications Relay's relay service is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Virgin Islands Telecommunications Relay defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal. The transmission circuits used by Virgin Islands' provider meet or exceed industry interexchange performance standards for circuit loss and noise.

Past Compliance
Over the past contract term, Virgin Islands Telecommunications Relay has never come close to blocking 1 call in 100.

Future Compliance
Virgin Islands TRS, through its TRS contracts with Sprint, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's Relay system ensures that an excess of 99.9 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604(b)(ii)(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Innovative Telephone has systems in place to receive call attempt rates and rates of blocked calls from its TRS provider.

Past Compliance
Virgin Islands Telecommunications Relay Service, as provided by Hamilton, measured, recorded and reported its answer performance and blockage rate information to the Innovative Telephone and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

Future Compliance
Beginning in May of 2013, performance of inbound traffic on each Virgin Island TRS toll-free number where it enters the Sprint network or relay center facility will be measured continuously and reported both daily and monthly. These measurements, which will include traffic volume and blockage data, will be compiled into a monthly report available to the Virgin Islands Telecommunications Relay.

§64.604(b)(iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

Virgin Islands Telecommunications Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604(b)(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users. Virgin Islands Telecommunications Relay provides relay users with access to the interexchange carrier of their choice through TRS, and to all other operator services, to the same extent that such access is provided to voice users. Long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each long distance call, Virgin Islands Telecommunications Relay forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. Virgin Islands Telecommunications Relay's provider has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive Virgin Islands Telecommunications Relay traffic. Virgin Islands Telecommunications Relay offers equal access to all carriers who choose to participate.

Virgin Islands Telecommunications Relay provides relay users with access to all other Operator Services to the same extent as that provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by Virgin Islands Telecommunications Relay is based on the relay users' ANI that provides automatic connection to the carrier of choice for long distance calls made by the relay user. Relay users complete a customer profile with their carrier information and Virgin Islands Telecommunications Relay adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the CA of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the CA is able to do so.

Past Compliance

Virgin Islands Telecommunications Relay contacted all carriers that are requested by Virgin Islands Telecommunications Relay users to see if they will participate in relay equal access. Virgin Islands' Relay provider worked through ordering and testing phases with that carrier to ensure that the carrier became available to Virgin Islands Telecommunications Relay users. Virgin Islands' Relay provider maintained a list of participating long distance carriers and makes this information available to relay users. The list of providers for the Virgin Islands (as of March 2013) was:

- AT&T
- Broadwing/Level 3
- Century Link
- Charter
- Global Crossing
- InterBel
- MCI/Worldcom
- McLeod
- Primus Telecom
- SBC/AT&T
- Sprint
- VarTec Five Line
- Verizon

Future Compliance

With the transition to Sprint, Virgin Islands TRS users will continue to have equal access to their chosen inter-exchange carrier through Relay to the same extent access is provided to voice users.

TRS users are encouraged to register their preferred Carrier-of-Choice with Customer Service. Users who have not registered their preferred Carrier-of-Choice are encouraged to contact the toll-free telephone support (Customer Service) to complete their registration.

Virgin Island TRS will rely on Sprint to provide its Relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint's network has the capability to permit users to select the IXC or LEC of their choice in accordance with State and Federal law.

Sprint provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate Relay calls. Sprint routes calls to the designated carrier in as efficient a manner as possible. Sprint includes the identification of the call as a Relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone, etc.) Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the Relay call.

Sprint encourages all Carriers to participate in its Carrier of Choice ("COC") program. When the requested Carrier is not a COC participant, Sprint Relay has established a procedure where the Carrier is notified, verbally and in writing, of its obligation to provide access to relay users and encourage their participation.

Outlined below is the process used by CAs to process Carrier-of-Choice calls and subsequent instructions to relay callers:

- Sprint Relay CA answers the call
- The caller provides the toll-call information.
- The caller provides preferred Carrier information either registered in the user database or for a specific call.
- If the preferred Carrier is not available through the Relay, the CA informs the caller with the standard phrase:

"I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."

- The user may choose to have another Carrier handle the call. Sprint Relay then informs the unavailable Carrier of its obligation to provide access through the Relay Service.
- The CA outdials the call utilizing the preferred Carrier. If no Carrier is specified, the call will be carried over the Sprint network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint currently has 240 carriers participating in the Sprint Relay's TRS Carrier-of-Choice program. Participation of Carriers in the US Virgin Islands is dependent on whether carrier is authorized to provide service in The US Virgin Islands and connectivity to the Sprint Access Tandem.

B.4 TRS Facilities

§64.604(b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Virgin Islands Telecommunications Relay provides telecommunications relay service 24 hours a day, 7 days a week.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The Virgin Islands Telecommunications Relay Service is operated in a manner that is functionally equivalent to normal central offices and includes uninterruptible power for emergency use.

Past Compliance

The facility used by Virgin Islands Telecommunications Relay had the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Virgin Islands Telecommunications Relay was operated from a center located in Baton Rouge, Louisiana. Virgin Islands Telecommunications Relay calls automatically overflowed during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the Virgin Islands Telecommunications Relay provider. This ensured continuous operation of the Virgin Islands Telecommunications Relay.

The switches and relay platforms used by Virgin Islands Telecommunications Relay's provider were located in the Louisiana and the Nebraska relay centers. Workstation equipment, database information, and CA were located in all relay centers. Workstations in the Maryland and Massachusetts centers are controlled by the main processing and switch unit located in Nebraska via digital telecommunications facilities which were redundant T -1 circuits. Workstations in the Virgin Islands Center are controlled by the main processing and switch unit located in Louisiana via digital telecommunications facilities which are redundant T -1 circuits. All incoming relay calls entered the relay provider's network. Calls then could be connected to workstations in any of the Relay provider's facilities. This all happened instantaneously with no call delays. Calls made to the terminating party exited through the call network as well. Virgin Islands Telecommunications Relay users received outstanding call processing and superior answer performance as a result of this network configuration.

Uninterruptible Power

All relay centers operated by Virgin Islands' Relay provider made use of an uninterruptible power source with full battery backup to operate each center at full capacity for extended periods of time. In addition, battery back-up systems had the capability to automatically connect to a generator at each of its existing relay centers. The combination of battery and generator back-up allowed Virgin Islands Telecommunications Relay's provider to provide relay service for days and weeks at a time during power outages.

The power system supported the switch system and its peripherals, switch room environmentals (air conditioning/heating, fire suppression system, emergency lights & system alarms), CA consoles/terminals, CA work-site and lighting and Call Detail Record recording at each center. Employees were given procedures to follow in the event of emergency.

Virgin Islands' Relay provider provided auxiliary power sources for nine central offices in addition to all its relay centers and has significant experience at purchasing, installing, testing and insuring that such back-up equipment is in place. All of Hamilton's back-up power systems had redundancy features functionally equivalent to the equipment in normal central offices including uninterruptible power for emergency use.

Switching System

Virgin Islands Telecommunications Relay provider's second generation relay platform made use of an Excel telecommunications switch. Its switch was a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allowed for simplified and cost-effective application development. The switch supported up to 2,048 ports in a single high-density system. Its components included a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The switch adapted to all standard network and line interfaces, including TI, EI, 11, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records.

The ISOS was a fully operational basic switch and has great flexibility. Virgin Islands' Relay provider took advantage of this flexibility and had customized many relay functions in the ISOS operating system.

The relay workstation application took advantage of the power and flexibility of the ISOS operating system. It provided a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing. The switching systems contained a fully redundant central processing unit on hot standby with automatic failover. This was to ensure that no calls are dropped due to technical failure. It also had a redundant power supply on hot standby. Backup control and database servers were also on hot standby with automatic failover. Virgin Islands' Relay provider maintained an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The on-sight switching system spare equipment included:

- D4 channel bank
- All required channel bank cards
- T1 CSU packs
- Switch T -1 card
- Switch conference card

If one of the switching systems could be returned to service by transferring control to redundant equipment, the calls automatically overflowed to another switching system. The switching systems were designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, was used to control and monitor each of the switching systems. The control systems provided online system monitoring and real-time programming capabilities that would not take the system off-line and the ability to perform preventative maintenance or repair while the system was online. Remote capabilities were provided to remotely monitor, reconfigure or controll the sytem as necessary. All of this was provided to ensure the required levels of service are always met.

Virgin Islands' Relay provider has made changes to its relay platform in recent years, making use of leading edge technology. It has upgraded its switching servers to new hardware that evolved its switching operating system from 32 bit UNIX to 64 bit Linux for more robust hardware support; and tested and deployed new switching control code which allowed additional ad hoc reporting capabilities for comprehensive traffic analysis and enhanced failover and recovery. Virgin Islands' Relay provider has also replaced database servers with new hardware and replaced legacy profile database servers with SQL servers for improved redundancy and database management. Finally Virgin Islands' Relay provider has completed a multi-year upgrade of all production workstations to newer, standardized hardware; upgraded workstation operating systems from 16 bit to 32 bit which provides a higher level of stability; and rolled out several new workstation versions to support a variety of new features.

Future Compliance

Innovative Telephone will contract with Sprint's Relay centers effective May 1, 2013, which are equipped with an Uninterruptible Power Supply (UPS), generator, and sufficient fuel to provide power for 24 hours following a power failure. These back-up power systems can continue to provide power beyond 24 hours as long as fuel is readily available.

Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint Relay system and routes the calls to other operating call centers. Virgin Island TRS customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored..

All of the system preventive maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities.

§64.604(b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

Virgin Islands Telecommunications Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604(b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

Virgin Islands Telecommunications Relay does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology

§64.604(b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7

technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Virgin Islands Telecommunications Relay Service supports improved technology for its customers that enhance the lives of its customers through functionally-equivalent telecommunication access. Virgin Islands support Caller ID using SS7 technology.

Past Compliance
Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Virgin Islands Telecommunications Relay was adaptable to new technology.

Signaling System Seven (SS7)
The relay platform used by Virgin Islands Telecommunications Relay has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services were delivered in the public switched network (i.e. Virgin Islands Telecommunications Relay provided true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

Future Compliance
Virgin Island TRS through Sprint will be in full compliance with 47 C.F.R. §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, Virgin Island TRS will continue to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. Virgin Island TRS receives calling party identifying information including blocking information, from all relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound Relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology
As the provider of relay services for the Territory of The US Virgin Islands, Sprint offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option

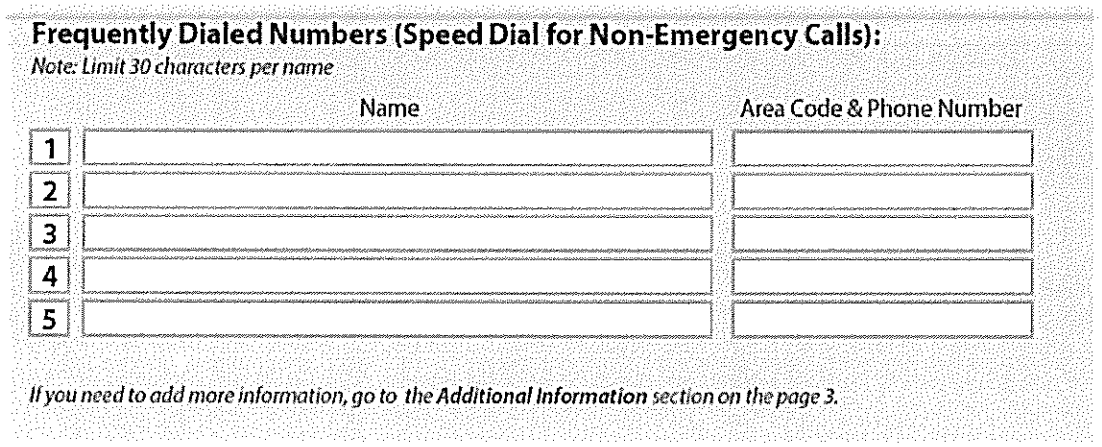
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

STS Message Retention
In addition, Sprint has expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the Relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS and request that the call be attempted without delay. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers
Sprint will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows Relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay.

Please see the graphic below for the written Customer Profile form, which encourages STS users to register speed dial entries.


Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):
Note: Limit 30 characters per name

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

If you need to add more information, go to the ***Additional Information*** *section on the page 3.*

STS with Privacy Option
Sprint offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information
Communicating telephone numbers may be difficult for some STS users. This feature allows STS users to simply advise friends, family and others to dial 7-1-1 to reach them. Once connected, the person can simply provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner the inbound caller can be connected with the STS user at their location.

Emergency Numbers
In most emergency situations, STS callers dial 9-1-1 first for emergency help. However, this may be especially challenging for STS users. STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

§64.604(b)(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Through the use of SS7 signaling Virgin Islands Telecommunications Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. Virgin Islands Telecommunications Relay provides this information on all call types and on all carriers. Virgin Islands Telecommunications Relay brings true functional equivalence to Caller ID relay users. Virgin Islands Telecommunications Relay receives and passes calling line identification information, including blocking information from all users calling through the relay service.

Past Compliance
The relay platform used by Virgin Islands Telecommunications Relay has made use of SS7 signaling since February 2002.

Future Compliance
Virgin Island TRS, through the contract with Sprint, will continue to provide true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint will receive calling party identifying information including blocking information, from all TRS users.

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

The Virgin Islands Telecommunications Relay Service tracks all TRS complaints and all other customer service activity. The Virgin Islands Telecommunications Relay Service maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the Territory until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. **All information is kept on file and available to Innovative Telephone and the FCC.** Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

Past Compliance

The Virgin Islands Telecommunications Relay Service's provider reported complaint activity to Innovative Telephone on a monthly basis. Innovative Telephone submitted the necessary information to the FCC as required in § 64.601 Mandatory Minimum Standards on an annual basis. Innovative Telephone has submitted copies of its 2008 through 2012 complaint logs to the FCC. The provider for the Virgin Islands Telecommunications Relay Service issued each complaint a Record ID number to enable Innovative Telephone and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainants.

SEE APPENDIX D for Years 2008 – 2012 complaint logs.

Innovative Telephone complaint log consisted of the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC

- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breech
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access

Future Compliance

Virgin Island Telecommunication Relay Service, through Sprint, has established policies regarding complaints, inquiries, comments and commendations related to Relay Services and personnel. Upon receipt of a direct complaint filed by a customer, a designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint will ensure that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

Sprint will identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice or Speech-to-Speech), customer contact information (when given), CA identification numbers, the call handling center and over forty-five contact categories including: complaints, inquires and unsolicited commendations.

Sprint will submit reports detailing the information above. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken i.e. technical support, service explanation, CA development area, preparation of commendation

All contacts and complaints received by Customer Service, Supervisors, and Account Management will be documented in Sprint's customer contact database.

Customer Contacts Online Database (CCOD)
To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts.

The CCOD will automatically notify the TRS Sprint program manager assigned to the US Virgin Islands via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC

By approximately June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the USVI and Innovative Telephone. Innovative Telephone will file the complaint log with the FCC by July 1st of each year.

C.2 Contact Persons

§64.604(c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions; (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

Innovative Telephone submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the Virgin Islands office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to

which correspondence should be sent. Following is the name of the contact at Innovative Telephone for those purposes:

Mickey Breton
VP and General Manager
Innovative Telephone
4611 Tutu Park Suite #200
St. Thomas, VI 00802
Phone: (340) 715-8341
Fax: 340-775-8567
Email: mickey.breton@innovativevi.net

Past Compliance

The Hamilton Telephone Company d/b/a Hamilton Telecommunications, the provider for the Virgin Islands Telecommunications Relay Service, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission includes the name and address of the Territory office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, and physical address to which correspondence should be sent. Following is the name of the contact at The Hamilton Telephone Company for those purposes:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1006 12th Street
Aurora, NE 68818
Voice/TTY 402-694-3656
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

Future Compliance
Effective May 1, 2012, the Sprint Relay Customer Service group will be the primary contact for all customer issues including compliments, complaints, inquiries, grievances, and suggestions. The address is:

Sprint TRS Customer Service
P.O. Box 29230
Shawnee Mission, KS 66201-9230
Web Address: http://www.sprintrelay.com/contact_us/index.php
E-mail: Sprint.TRSCustServ@sprint.com
Fax: 877-877-3291
Voice: 800-676-3777
TTY: 800-676-3777

C.3 Public Access to Information

§64.604(c)(3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Community Outreach, Public Relations and Educational Programs
The Virgin Islands Telecommunications Relay Service will provide community and business outreach and promotes a public awareness campaign to educate all Virgin Islands citizens about the relay service. These efforts will educate and heighten public awareness of 7-1-1 and TRS throughout the Virgin Islands through marketing, advertising and community involvement. In compliance with FCC requirements, which call for outreach to all telephone users, the Virgin Islands Telecommunications Relay Service's outreach initiatives focus on the need to educate the hearing community. As it has been in the past, the primary outreach concern is the number of hearing people who hang up on relay calls. Through participation in promotional events, presentations, workshops and instructional seminars, the Virgin Islands Telecommunications Relay Service will reach out to all relay user communities and always adjusts its programs to meet the specific needs of every audience.

The Virgin Islands Telecommunications Relay Service's outreach and awareness efforts will specifically target individuals who are deaf, hard of hearing, late deafened, deaf-blind or have difficulty speaking, as well as their family, friends and caregivers. The Virgin Islands Telecommunications Relay Service will perform a variety of activities to inform the public about relay and regularly participates in activities held by Virgin Islands organizations that serve relay users.

The outreach team will offer informative presentations on the features of relay services to organizations, relay user groups, businesses, educators and students, health care providers, 9-1-1 call centers, emergency, fire and law enforcement personnel, libraries, senior centers, and public and private entities. The Virgin Islands Telecommunications Relay Service's territory wide outreach and awareness efforts will include:

- Presentations
- Exhibits
- 911 Education
- Strategies for reaching Hard to Reach Relay Users
  - Hard of Hearing and Elderly Strategies
  - Speech to Speech
  - Deaf Blind
- Outreach to Businesses and Educational Institutions
- Outreach to Spanish
- Equipment Distribution Programs
- Involvement of Deaf and Territory Agencies
- Customized Outreach materials
- Promotional Materials
- Variety of Brochures
- Description of Complaint Procedures in Printed Materials
- Bill Inserts and Directory Pages
- Newsletters
- TRS Web site
- Social Media
- Press Release and Public Relations
- Print Advertising
- Media Advertising

Please refer to APPENDIX E for sample outreach materials and a list of the outreach activities the Virgin Islands Telecommunications Relay Service has accomplished.

C.4 Rates

§64.604(c)(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

The Virgin Islands Telecommunications Relay Service's provider performs no billing. All billing is performed by the relay users' carrier of choice for toll calls. Thus, the relay users' carrier of choice bills all toll calls at their applicable discounted rate for relay users. The Virgin Islands Telecommunications Relay Service's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is

responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

C.5 Jurisdictional Separation of Costs

§64.604(c)(5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

Costs of Providing TRS

The Virgin Islands Telecommunications Relay Service's provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated by Innovative Telephone and recovered in Innovative Telephone's rates for local telephone service.

Cost Recovery

Intrastate Calling

The Virgin Islands Telecommunications Relay Service receives intrastate funding directly from Innovative Telephone, which recovers the intrastate costs in the rates for local telephone service. There is no separately stated TRS charge for these calls. All intrastate TRS callers are only billed local telephone rates which are the same as all local callers. No intrastate toll charges are applicable in the U.S. Virgin Islands.

Interstate Calling

The Virgin Islands Telecommunications Relay Service recovers the costs of interstate calls originating in the Virgin Islands by billing the federal TRS fund in accordance with Section 64.404(c)(5)(iii) of the Commission's rules.

Telecommunications Relay Fund

§64.604(c)(5)(iii) through §64.604 (c)(iii)((M) do not pertain to State programs. However, the United States Virgin Islands contracts with Hamilton and will contract with Sprint (beginning May 1, 2013) who contribute and collect interstate funds through RLSA. It is the Territory's understanding that Hamilton and Sprint comply with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers. The United States Virgin Islands do not provide VRS services, do not contract to provide VRS services and are exempt from this section.

C.6 Complaints

§64.604(c)(6)(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Innovative Telephone will resolve all intrastate complaints within 180 days after the complaint is first filed with the Territory, regardless of whether the complaint is filed with the Territory relay administrator, a Territory PUC, the relay provider or with any other Territory entity.

All complaints are reviewed by the TRS Provider staff to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint will be escalated to the TRS provider management, and then to Innovative Telephone when needed. The Virgin Islands Telecommunications Relay Service describes the above procedures and FCC complaint processes, including contact information for both Innovative Telephone and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by the Virgin Islands Telecommunications Relay Service or with any action taken, the Virgin Islands Telecommunications Relay Service's monthly report to Innovative Telephone will so state. The user then has the opportunity and is given written notice of that opportunity by the Virgin Islands Telecommunications Relay Service to have the complaint and action of the Virgin Islands Telecommunications Relay Service reviewed by Innovative Telephone for such action as it may deem appropriate in accordance with its rules and regulation. Innovative Telephone will act on such complaint no later than 180 days from the filing of the complaint.

Innovative Telephone will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the Territory of the Virgin Islands. Innovative Telephone will cooperate in the investigation or resolution of any and all complaints concerning the Virgin Islands Telecommunications Relay Service with the Federal Communication's Commission.

SEE APPENDIX D for Years 2008 – 2012 complaint logs.

C.7 Treatment of TRS Customer Info

§64.604(c)(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer

of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

Virgin Islands Telecommunication Relay Service complies with all FCC requirements for the treatment of customer information including the transfer of Customer Profile Data between providers. Innovative Telephone prohibits TRS providers from selling, distributing, sharing or revealing customer information, unless compelled to do so by lawful order.

Past Compliance
The contract between Innovative Telephone and The Hamilton Telephone company d/b/a Hamilton Telecommunications provided for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton provided the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Virgin Islands Telecommunications Relay Service user to his/her called party. Hamilton has not and will never make any relay information available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.

Future Compliance
Likewise, the contract between Innovative Telephone and Sprint includes a provision for transfer of TRS customer profile data from Sprint to an incoming TRS provider. At the end of the ensuing contract(s) Sprint will transfer all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint will not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

§64.606 State Certification

§64.606(3)(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

Meets Standards

Please refer to the Operational Standards, Technical Standards and Functional Standards sections of this application for a description of how the Virgin Islands meets or exceeds all operational, technical and functional minimum standards contained in §64.604.

Past Compliance

Innovative Telephone provided telecommunications service in the Virgin Islands and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies with which it must comply. The contract entered into between Innovative Telephone and Hamilton Telephone Company provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which Innovative Telephone could terminate the agreement with Hamilton and seek such other remedies as may be available by law. Consumers also have the opportunity, pursuant to the established rules of Innovative Telephone, to file complaints or petitions concerning the Virgin Islands Telecommunications Relay Service requesting modifications in the provision of this service or otherwise resolving issues or concerns of the public.

Complaint Procedures

As mentioned in a few sections earlier, Intrastate Virgin Islands Telecommunications Relay Service complaints are processed in the following manner for Innovative Telephone by its TRS provider: Trained personnel answer all the Virgin Islands Telecommunications Relay Service Customer Service calls. The Virgin Islands Telecommunications Relay Service provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers with the Virgin Islands TRS inquiries and complaints. Customers may also contact The Virgin Islands Telecommunications Relay Service via e-mail and through the Virgin Islands Telecommunications Relay Service web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. The Virgin Islands Telecommunications Relay Service processes any complaints, which originate via e-mail, fax, telephone, regular mail, outreach events, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is the Virgin Islands Telecommunications Relay Service Customer Service department. The National Customer Service Manager, Center Manager and Vice President of Relay Service for Hamilton also view all complaint information.

In the event of a complaint regarding the Virgin Islands Telecommunications Relay Service, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate coaching, re-training and counseling steps will be taken by the primary Supervisor to resolve the situation. The Virgin Islands Telecommunications Relay Service's detailed call records show each key command (not actual text) the CA makes. The Virgin Islands Telecommunications Relay Service can easily investigate the

Virgin Islands Telecommunications Relay Service CA complaints and take disciplinary action when needed.

- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the National Customer Service Manager to ensure that all complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to Innovative Telephone when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem. The Virgin Islands Telecommunications Relay Service describes the above procedures and FCC complaint processes, including contact information for both Innovative Telephone and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by the Virgin Islands Telecommunications Relay Service or with any action taken, the Virgin Islands Telecommunications Relay Service's monthly report to Innovative Telephone will so state. The user then has the opportunity and is given written notice of that opportunity by the Virgin Islands Telecommunications Relay Service to have the complaint and action of the Virgin Islands Telecommunications Relay Service reviewed by Innovative Telephone for such action as it may deem appropriate in accordance with its rules and regulation. Innovative Telephone will act on such complaint no later than 180 days from the filing of the complaint.

Innovative Telephone will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the Territory of the Virgin Islands. Innovative Telephone will cooperate in the investigation or resolution of any and all complaints concerning the Virgin Islands Telecommunications Relay Service with the Federal Communication's Commission.

Exceeds Standards

As demonstrated in the following, where Virgin Islands Telecommunications Relay Service program exceeds the mandatory minimum standards contained in §64.604, Virgin Islands Telecommunications Relay Service establishes that its program in no way conflicts with federal law.

CA Training and Procedures

The Virgin Islands Telecommunications Relay Service not only meets, but also exceeds FCC Communication Assistant standards in the areas of hiring and training practices, typing speed to accuracy and in-call replacement of CAs.

Ability to Type at 60 wpm
The Virgin Islands Telecommunications Relay Service Communication Assistants must type 60 words per minute. The Virgin Islands Telecommunications Relay Service exceeds this service level by requiring CAs to maintain a high accuracy level in addition to 60-wpm typing.

Turbo Code
The Virgin Islands Telecommunications Relay Service exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. The Virgin Islands Telecommunications Relay Service provides Turbo Code, a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. The Virgin Islands Telecommunications Relay Service users are able to automatically connect "Turbo Code" on every relay call type. With Turbo Code, the Virgin Islands Telecommunications Relay Service users can use their Turbo Code Interrupt feature.

Intrastate Spanish
In addition to Interstate Spanish to Spanish, the Virgin Islands Telecommunications Relay Service provides Intrastate Spanish to Spanish, Spanish to English and English to Spanish call handling to the relay users of the Virgin Islands and processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, the Virgin Islands Telecommunications Relay Service requires Spanish CAs pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls.

SS7 Signaling
The relay platform used by the Virgin Islands Telecommunications Relay Service has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. the Virgin Islands Telecommunications Relay Service provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

Re-Certification Status
The Virgin Islands is currently certified to provide intrastate TRS through July 26, 2013. This application is submitted to re-certify the Virgin Islands for an additional five years.

Future Compliance
Likewise, the contract between Innovative Telephone and Sprint includes services which meet and/or exceed FCC minimum standards as described in this FCC Recertficaiton application.

§64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

The Virgin Islands Telecommunications Relay Service understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application Innovative Telephone intends that the operation of the Virgin Islands Telecommunications Relay Service will continue to be in compliance with the Federal Communication Commission rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Virgin Islands Telecommunications Relay Service to be out of compliance, Innovative Telephone agrees to take such action as may be reasonably required to bring Virgin Islands Telecommunications Relay Service into compliance.

Future Compliance

Effective May 1, 2013 Sprint will begin offering TRS relay services for the U.S. Virgin Islands. Innovative Telephone will submit this notice to the FCC consistent with the FCC rules.

APPENDICES